

From: Gregory Orehowsky
To: Justin Greuel
Cc: Jay Smith
Subject: Re: Fw: Dodge Ram 6.7L Applications
Date: 11/30/2012 01:01 PM

Deliberative Process / Ex. 5 Looking back at the 2/15/12 material Rich Wagner sent, they told us no torque derate for the Chrysler. The Chrysler stuff is barely mentioned.

Deliberative Process / Ex. 5

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Phone: 202-343-9292
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▼ Justin Greuel---11/30/2012 12:50:50 PM---Jay, While it's not the greatest intermediate inducement, we did say in the June 2011 draft guidance

From: Justin Greuel/DC/USEPA/US
To: Jay Smith/AA/USEPA/US@EPA
Cc: Gregory Orehowsky/DC/USEPA/US@EPA
Date: 11/30/2012 12:50 PM
Subject: Re: Fw: Dodge Ram 6.7L Applications

Jay,

Deliberative Process / Ex. 5

Sound reasonable? Greg, any thoughts you want to add?

Thanks,

Justin

▼ Jay Smith---11/28/2012 08:19:11 AM---To summarize, the ISB-Ram SCR inducements are less stringent than our guidance and their competitors

From: Jay Smith/AA/USEPA/US
To: Justin Greuel/DC/USEPA/US@EPA, Gregory

Orehowsky/DC/USEPA/US@EPA
Date: 11/28/2012 08:19 AM
Subject: Fw: Dodge Ram 6.7L Applications

Deliberative Process / Ex. 5

Please let me know your thoughts.

Jay

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----- Forwarded by Jay Smith/AA/USEPA/US on 11/28/2012 07:39 AM -----

From: victor.a.schneider@cummins.com
To: Jay Smith/AA/USEPA/US@EPA
Cc: joseph.sawin@cummins.com, rich.s.wagner@cummins.com
Date: 11/27/2012 04:15 PM
Subject: Re: Dodge Ram 6.7L Applications

Jay -

CBI/ Ex. 4

From: Smith.Jay@epamail.epa.gov
To: victor.a.schneider@cummins.com
Cc: joseph.sawin@cummins.com
Date: 11/27/2012 01:43 PM
Subject: Re: Dodge Ram 6.7L Applications

With regard to the discussion on SCR-related inducements below, I do have some concerns that this strategy is not as stringent as the primary competitors in this segment and does not meet our guidance. First, it

CBI/ Ex. 4

I've asked Greg to provide some history on why this was originally approved but in the mean time, I'd like you to take this under consideration.

Sincerely,

Jay Smith

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From: victor.a.schneider@cummins.com
To: Jay Smith/AA/USEPA/US@EPA
Cc: joseph.sawin@cummins.com
Date: 11/19/2012 04:43 PM
Subject: Re: Dodge Ram 6.7L Applications

Answers in red below.

From: Smith.Jay@epamail.epa.gov
To: victor.a.schneider@cummins.com
Date: 11/14/2012 03:53 PM
Subject: Dodge Ram 6.7L Applications

Hello Victor,

I've completed my review of the two Dodge Ram 6.7L applications.
Here are some things we'll need to address:

-I do not have a statement of compliance for the 313Q family.
Statements of compliance for both 313Q and 313S are being supplied to you.

-Can you supply a copy of the materials that are furnished to the end user explaining how to properly maintain the emission control system and how to obtain/refill the DEF tank?
I'm getting you the owners manual.

-Why is operator commanded regeneration not an option with these families (AECD 10-6 on other CMI applications)? In our experience, this functionality is almost a necessity for applications typical of those that this product will be used in (ambulances, construction vehicles, etc), where normal operation will not produce the conditions necessary for regeneration.

Chrysler specified a manual regen to be a service event only. This has been in place since 2007 and we are not aware of any issues.

CBI/ Ex. 4

CBI/ Ex. 4

CBI/ Ex. 4

CBI/ Ex. 4

-For the DEF quality monitor, near the bottom of slide 468 there is a range of SET NOx emissions. Does this represent the emission level at which you would be able to make the determination that a DEF quality fault exists? If not, what does this mean?

This is the emissions increase that would be seen when a DEF quality fault is detected.

-Just out of curiosity, are there any Dodge-Cummins products for 2013 that do not use CBI/ Ex. 4? I believe there was still a chassis-certified ISB with an CBI/ Ex. 4 in 2012, if I'm not mistaken.

All of the 2013 Dodge-Cummins engines in 2013 will use CBI/ Ex. 4 including the chassis certified vehicles.

Once these questions are addressed, we'll only be waiting on OBD approval.

Sincerely,

Jay Smith

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